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September 6, 2024

Via ECF

Hon. Cheryl L. Pollak
U.S. Magistrate Judge
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: *Illuminada Ortega v. Ruben Yeghoyan et al*, 21 cv 01125
Request for a 7-day extension of time to provide joint update to the Court

Dear Judge Pollak:

I represent Defendant Ruben Yeghoyan on the above captioned matter. I write with consent of the Plaintiff's counsel Emanuel Kataev to respectfully request a 7-day extension of time to file objections to the Amended Complaint and provide a joint status report.

On August 7, 2024, the Court ordered, *inter alia*, that (1) Defendants file objections to the proposed Amended Complaint within a week of receipt and (2) the parties file a joint status report by September 6, 2024. ECF. No. 93.

On August 31, 2024, Plaintiff's counsel provided a proposed amended complaint to Defendant Yeghoyan's counsel. On September 3, 2024, counsel for Defendant Yeghoyan conferred with counsel for Plaintiff. The parties respectfully need more time more time to continue discussions.

As such, I respectfully request a 7-day extension until September 13, 2024 to file a joint status report and Defendant Yeghoyan's objections to the amended complaint. Plaintiff's counsel, Emanuel Kataev consents to this extension.

Thank you for your time and consideration of this request.

Respectfully Submitted,
s/ Elena Fast
Elena Fast, Esq.